



OPASTCO

21 Dupont Circle
NW
Suite 700
Washington, DC 20036

October 19, 2005

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

***Ex Parte* Notice**

RE: In the Matter of

**Federal-State Joint Board on Universal Service
CC Docket No. 96-45**

**1998 Biennial Regulatory Review – Streamlined Contributor
Reporting Requirements Associated with Administration of
Telecommunications Relay Service, North American Numbering Plan,
Local Number Portability, and Universal Service Support
Mechanisms
CC Docket No. 98-171**

**Telecommunications Services for Individuals with Hearing and
Speech Disabilities, and the Americans with Disabilities Act of 1990
CC Docket No. 90-571**

**Administration of the North American Numbering Plan and North
American Numbering Plan Cost Recovery Contribution Factor and
Fund Size
CC Docket No. 92-237
NSD File No. L-00-72**

**Number Resource Optimization
CC Docket No. 99-200**

Telephone Number Portability

CC Docket No. 95-116

**Truth-in-Billing and Billing Format
CC Docket No. 98-170**

**Appropriate Framework for Broadband Access to the Internet over
Wireline Facilities; Universal Service Obligations of Broadband
Providers
CC Docket No. 02-33**

Dear Ms. Dortch:

On October 19, 2005, John Rose and Stuart Polikoff of the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO) met with staff from the Wireline Competition Bureau (WCB). Representing the WCB was Richard Lerner, Rodger Woock, Narda Jones, Cathy Carpino, Carol Pomponio, James Lande, Greg Guice, and James Eisner.

We shared OPASTCO's views on reforming the contribution methodology for the Universal Service Fund (USF). We stated that in order to ensure a sufficient, sustainable and stable USF for the long term, the Commission should establish the broadest possible base of contributors. To accomplish this, the Commission should use its permissive authority under Section 254(d) of the Telecommunications Act of 1996 to assess "other provider[s] of interstate telecommunications," to the greatest extent possible. Most importantly, the Commission should require all facilities-based broadband Internet access providers, over all platforms, to contribute to the Fund. This should be done simultaneously with any other changes to the contribution methodology. If the goal of the Administration, Congress and the FCC is universal broadband deployment, then requiring equitable contributions from all facilities-based broadband Internet access providers, over all platforms, is essential.

We also stated that in order to maintain competitive neutrality, the Commission should require contributions from Voice over Internet Protocol (VoIP) providers that offer services that are a substitute for traditional landline phone service. Finally, regardless of the methodology that is adopted, the Commission should continue to require equitable contributions from interexchange carriers (IXCs), since Section 254(d) states that "[e]very telecommunications carrier that provides interstate telecommunications services shall contribute, on an equitable and nondiscriminatory basis..."

In accordance with FCC rules, this notice is being filed electronically in the above-captioned dockets.

Sincerely,

Stuart Polikoff
Director of Government Relations
OPASTCO